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14 Attorneys for Plaintiffs

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

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12 WARREN GARDNER, et al., Individually and) Case No. 3:19-cv-02561-WHO
13 on Behalf of All Others Similarly Situated,)
14 Plaintiffs,) **CLASS ACTION**
15 vs.)
16 STARKIST CO., a Delaware company,) **DECLARATION OF STUART A.**
17 Defendant.) **DAVIDSON IN SUPPORT OF**
18 _____) **PLAINTIFFS' MOTION FOR ISSUANCE**
19) **OF LETTER ROGATORY**
20) Date: January 6, 2021
21) Time: 2:00 p.m.
22) Judge: Hon. William H. Orrick Jr.
23) Location: Courtroom 2, 17th floor
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25)
26)
27)
28)

1 I, STUART A. DAVIDSON, declare and state as follows:

2 1. I am a partner at the law firm Robbins Geller Rudman & Dowd LLP, one of the
3 counsel for Plaintiffs in the above-captioned action. I am a member in good standing of the State
4 Bars of Florida and Minnesota and am admitted to practice *pro hac vice* before this Court in this
5 action. I make this declaration in support of Plaintiffs' Motion for Issuance of Letter Rogatory. I
6 am familiar with the files and records in this action and of the facts set forth in this declaration. If
7 called as a witness, I could and would testify competently to such facts.

8 2. The requested letter rogatory seeks documents from a foreign company, Dongwon
9 Industries Co. Ltd ("Dongwon"). Dongwon is a company incorporated and headquartered in the
10 Republic of Korea.

11 3. Attached hereto as **Exhibit A** is a true and correct copy of StarKist Co.'s Responses
12 and Objections to Plaintiffs' Revised First Set of Requests for Admission.

13 4. Attached hereto as **Exhibit B** is a true and correct copy of StarKist Co.'s Responses
14 and Objections to Plaintiffs' Revised First Set of Requests for Production of Documents.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct.

17 Executed this 23rd day of November 2020, at Boca Raton, Florida.

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19 /s/ Stuart A. Davidson
20 Stuart A. Davidson
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